



June 14, 2012

2121 El Camino Investors, LLC
2121 S. El Camino Real, Suite B101
San Mateo, CA 94403
Attn: Trish Kincheloe, Property Manager
c/o Matthew Love at Rossi Group

Email: mlove@rossigrp.com

Dear Ms. Kincheloe:

RE: TOWER PLAZA
2121 South El Camino Real, San Mateo, California
SITE ACCESSIBILITY REVIEW
Marx|Okubo Job No. 12-9030

Marx|Okubo Associates, Inc. (Marx|Okubo) has performed site visits at the request of 2121 El Camino Investors, LLC in an effort to determine the current level of accessibility compliance. The site visit was performed per Marx|Okubo Proposal No. 12 9030 on February 6, 2012 by a Marx|Okubo team led by Sandy Blair, AIA, CASp, Vice President. Marx|Okubo was accompanied by Matthew Love from Rossi Group for a portion of the review.

The property consists of a 12-story high-rise office building (The Tower), a single-story office building (Building A), and three two-story office buildings (Buildings B, C, and D). The entire site is substantially covered by the first level of a five-story parking garage. Above this level is a concrete podium structure which provides access to the five office buildings and the second level of the garage. The five-story parking garage is accessed from Palm Avenue. There is a surface parking lot at El Camino Real. The ownership has discontinued the use of the Palm Avenue surface parking lot. A total of 601 parking stalls are provided. The Tower and Buildings A, B, and C were reportedly constructed in 1972, and Building D and the parking garage were constructed in 1974.

The site common areas and hardscape were reviewed, including the accessible routes from the public streets and within the site to each building, parking garage, surface parking lots, and common plaza area. Accessibility compliance was reviewed under the requirements of Chapter 11B of the 2010 California Building Code (CBC).

Definitions:

Some of the definitions are taken directly from *Chapter 11B of the CBC*.

Accessible Route: A continuous unobstructed path connecting accessible elements and spaces in an accessible building or facility that can be negotiated by a person with a disability using a wheelchair and that is also safe for and usable by people with other disabilities. According to the CBC, the accessible route shall, to the maximum extent feasible, coincide with the route for the general public. At least one accessible route should be provided within the site from accessible parking spaces and accessible passenger loading zones; public streets and sidewalks; and public transportation stops to the accessible building or facility entrance they serve.

Accessible Parking Space: Parking spaces clearly designated and reserved for regular-sized vehicles with authorization such as distinguishing placards or special license plates issued for persons with disabilities. Accessible parking spaces are provided with 5'-wide access aisles.

Cane Detectable Barrier: An element within the detectable range of equal or less than 27" in height above the finish floor or ground that gives sufficient time to detect the element with the cane before there is a body contact.

Circulation Path: An exterior or interior way of passage provided for pedestrian travel, including but not limited to, walks, hallways, courtyards, elevators, platform lifts, ramps, stairways, and landings.

Cross Slope: The slope that is perpendicular to the direction of travel.

Detectable Warning: A standardized surface feature built in or applied to walking surfaces or other elements to warn of hazards on a circulation path.

Protruding Object: An object that projects off a vertical surface or a post with leading edge more than 27" and not more than 80" in height above the finish floor or ground. Objects can project 4" maximum from a vertical surface. Post-mounted objects can project 12" maximum. When a protrusion that is greater than allowed happens, a cane detectable barrier should be provided.

Running Slope: The slope that is parallel to the direction of travel.

Technically Infeasible: With respect to an alteration of a building or a facility, something that has little likelihood of being accomplished because existing structural conditions would require removing or altering a load-bearing member that is an essential part of the structural frame; or because other existing physical or site constraints prohibit modification or addition of elements, spaces, or features that are in full and strict compliance with the minimum requirements.

Van Accessible Parking Space: Parking spaces clearly designated and reserved for specially modified vehicle designed for transporting a person in a manual or powered wheelchair with authorization such as distinguishing placards or special license plates issued for transporting persons with disabilities. Van accessible parking spaces are provided with 8'-wide access aisles.

The following list of findings are items of non-compliance with the corresponding CBC references. Generally, Marx|Okubo considered measurements within 1/4" to 1/2" (depending on the requirement) to be within construction tolerance.

A. ACCESSIBLE ROUTE

Per CBC 1114B.1, at least one accessible route should be provided from the public streets or sidewalks to the site, connect accessible buildings that are on the same site, and connect each story in multi-story buildings. Based on our site observation, the following issues were noted:

1. The main pedestrian site access is via stairs from the public sidewalk off El Camino Real up to the podium plaza level, and the required pedestrian accessible route is not provided. (CBC 1114B.1).
2. The pedestrian ramps serving the second floors of Buildings B and D should not be considered a part of the accessible route due to the excessive slope, length, and rise of the ramp run. Considering that the construction of the buildings predates the effective dates of the accessibility requirements of the CBC, the accessible routes to the second floors of the buildings are not required. Property management should take care not to characterize the ramp as an accessible ramp. (CBC 1133B.5).

B. PLATFORM LIFT

There is a platform lift at the El Camino Real surface parking lot adjacent to the accessible parking spaces, providing an accessible path of travel to the podium level plaza.

While low-energy power-operated doors are typically required for a platform lift, because the lift only serves two landings and have doors on opposite sides, it is permitted to have self-closing manual doors.

However, the current self-closing manual doors have the following non-compliance issues: (1) the required maneuvering clearance at the parking level door landing, 24" beyond the latch side, is not provided (CBC 1116B.2.3) and (2) the door operating force exceeds the maximum allowed 5 pounds for exterior doors (CBC 1133B.2.5).

C. PARKING

Each parking facility where parking is provided for the public is required to provide accessible parking spaces. The number of required accessible parking spaces should be calculated separately for each parking facility and is calculated as shown on the following table:

Number of Parking Spaces Required			
Facility	Total	Accessible Spaces	Van Spaces
Parking Garage	573	10	2
El Camino Real Surface Lot	24	1	1

Per CBC Table 11B-6 and 1129B.3.2.

The following issues were noted regarding the accessibility of the parking and the path of travel to and from the accessible parking:

1. The parking garage does not provide the required vertical clearance of 98" that CBC requires at **all** accessible parking spaces and at least one vehicle access route. Due to physical constraints of the concrete structure and because the garage was built prior to the effective date of the accessibility requirements of the CBC, complying with the requirement does not appear readily achievable. Also, CBC provides an exception that the vertical clearance at the entrance and within the parking garage is not required at existing buildings where the enforcing agency determines that due to physical constraints, compliance with these regulations would create an unreasonable hardship. (CBC 1129B.3 and 1130B).
2. Regarding the non-conforming vertical clearance at the parking garage, we recommend providing a sign at the entrance to the garage to direct high-top vans to the El Camino Real surface lot.
3. Parking space and access aisle:
 - i. The accessible parking space adjacent to the Building D entrance at the ground floor of the parking garage does not meet the dimensional requirements of an accessible parking space. Therefore, any signs or painted lettering identifying that space as accessible should be removed. (CBC 1129B.3).
 - ii. Per CBC, all accessible parking spaces are required to be 9' wide. The accessible spaces adjacent to the motorcycle stall and compact stalls on the second and third levels of the parking garage were observed to be $\pm 8'-8"$ wide. (CBC 1129B.3).

C. PARKING (*cont.*)

- iii. The borders of the access aisles are required to be painted blue. The access aisles borders at the parking garage ground floor should be corrected. (CBC 1129B.3).
4. Signage:
- i. Per CBC, the bottom of the parking space identification sign should be at 80" above the finish floor. However, given the low ceiling height of the parking garage, meeting the requirement is not achievable. We recommend providing poles under the ceiling-mounted signs on the second and third floors of the parking garage to allow cane detection as the signs drop down lower than 80" from the floor and are hazardous to visually impaired patrons. (CBC 1129B.4).
 - ii. The required information where the towed vehicles may be reclaimed should be provided on the unauthorized vehicle tow-away sign at the El Camino Real surface parking lot. (CBC 1129B.4).
 - iii. An additional compliant unauthorized vehicle tow-away sign should be posted in a conspicuous place at the entrance to the parking garage. (CBC 1129B.4).
5. Changes in level: The threshold between the 5th floor parking garage and the elevator lobby exceeds 1/2" maximum allowed. (CBC 1133B.7).

D. ELEVATOR

The parking garage elevator was reviewed for the site accessibility. No other elevators serving specific buildings within the site were reviewed. The parking garage elevator provides access to all five levels of the garage and is generally in compliance with accessibility requirements including hall call buttons, hall lanterns, door jamb markings, door sizes, car controls, and emergency communication systems. However, the cab size is ± 71" wide by **43" deep**, less than what the required 68" wide and **51" deep**. Due to physical constraints of the existing concrete structure, complying with the requirement does not appear readily achievable. The CBC provides an exception that in existing buildings, where existing shaft configuration prohibits the strict compliance, an equivalent facilitation may be provided with different dimensions where it can be demonstrated that a person using a wheelchair can enter and operate the elevator. (CBC 1116B.1.8).

E. STAIRWAYS AND STAIR ENCLOSURES

The accessibility of the exterior stairways around the site as well as the exit stairs in the parking garage was reviewed. Given the age of the building, the fact that the access to the second floors of the two-story buildings are not required, and the presence of the garage elevator providing wheelchair access, the complete compliance with the current accessibility requirements for the stairs is not required.

1. The open risers at the exit stairs between Buildings A and B, two exterior stairs at Building C, and two exit stairs in the parking garage are noncompliant. (CBC 1133B.4.5.2).
2. Handrails:
 - i. The handrails are mounted ± 1 inch below the required height (between 34" to 38" above the nosing of the treads) at Building C exterior stairs and all three parking garage exit stairs (two within the exit enclosures and one by Building A secondary entrance). (CBC 1133B.4.2.1).
 - ii. Compliant handrail extensions, minimum of 12" beyond the top nosing and 12" plus the tread width beyond the bottom nosing, are not provided at the above mentioned stairways. (CBC 1133B.4.2.2).
 - iii. The intermediate handrails at the stairways at the 21st Avenue entrance of Building A and at the adjacent exit stairs from the garage are not provided. (CBC 1133B.4.1.1).
3. The permanently installed contrasting striping for the visually impaired are not provided at the top and bottom treads of parking garage interior exit stairs and at all treads and the upper approach of exterior stairs at the main site entry, exit stairs by Building A, and the exterior stairs of Building C. (CBC 1133.4.4).
4. The tactile floor identification signs are not provided at each floor level landing of the two exit stairways in the parking garage. (CBC 1133B.4.3).
5. The door at the 5th floor of the garage exit stairways adjacent to the elevator lobby has a pull side clearance of ± 10 " where a minimum 18" is required. However, relocating the door and frame within the concrete masonry wall does not appear to be readily achievable. (CBC 1133B.2.4.2).
6. The door at the ground floor of the parking garage exit stairways adjacent to Building D has a push side clearance of 7.5" where a minimum 12" is required. (CBC 1133B.2.4.2).

E. STAIRWAYS AND STAIR ENCLOSURES *(cont.)*

7. The cane detectable barriers under the vertical clearance of less than 80" under the bottom flights of the parking garage exit stairs and the exterior stairs of Building C are not provided. (CBC 1133B.8.6.2).

F. PROTRUDING OBJECTS

The fire department connections between Buildings B and C overhang more than 12" from the pipe. We recommend putting potted plants around the pipe to allow for cane detection. The types of pots and plants should be considered as to not obstruct the access to the fire department connections and should be reviewed and confirmed by the local fire department. (CBC 1133B.8.6.1).

G. SIGNAGE

Compliant directional and informational signs should be provided at the main site entry staircase and the side entrance to Building A to direct the visitors to the accessible site and building entries. Intermediate signs should be provided at every major junction where the accessible route of travel diverges from the regular circulation path. (CBC 1127B.3).

This concludes our site accessibility review of the property. Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

MARX|OKUBO ASSOCIATES, INC.



Sandy Blair, AIA, CASp
Vice President
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Enc: Exhibit A – Accessibility Site Plan
Exhibit B – Accessibility – Partial 1st Fl. Parking Plan
Exhibit C – El Camino Real Surface Lot Accessible Route